UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION - FLINT

IN RE:

SHARON ANN LEFFERTS

BANKRUPTCY NO.: 20-31653-JDA CHAPTER 7 HONORABLE JOEL D. APPLEBAUM

DEBTOR

MELISSA DIGIAMBERDINE (P68198) Attorney for Debtor 5080 W. Bristol Road, Suite 4 Flint, MI 48507 (810) 600-1534

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RESPONSE TO MOTION FOR REDEMPTION UNDER 11 U.S.C. § 722

Prestige Financial Services, Inc. ("Creditor"), in response to Debtor's Motion for Redemption Under 11 U.S.C. § 722 regarding a 2007 Honda Accord, states as follows:

- 1. As to Paragraph 1, the Creditor neither admits nor denies and leaves the Debtor to her proofs.
- 2. As to Paragraph 2, the Creditor neither admits nor denies and leaves the Debtor to her proofs.
- 3. As to Paragraph 3, the Creditor denies that the fair market value of the vehicle is \$200.00. Based on the NADA Official Used Car Guide, Creditor asserts that the value of the vehicle is approximately \$4,925.00.
- 4. As to Paragraph 4, the Creditor neither admits nor denies and leaves the Debtor to her proofs.

5. As to Paragraph 5, no response is required.

In conclusion, the Creditor prays that the Court deny Debtor's Motion for Redemption.

O'REILLY RANCILIO P.C.

/s/ Craig S. Schoenherr, Sr.

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